

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In Re:

MOUNTAINS OF SABER, LLC,  
  
Debtor.

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Chapter 11

Case No. 24-43693 (JMM)

**DECLARATION OF GLENN SORENSEN IN SUPPORT OF APPLICATION TO  
EMPLOY BROOKLYN PROPERTY MANAGERS CORP.**

Glenn Sorensen, under penalty of perjury, declares as follows:

1. I am a licensed real estate broker and the principal of the property management firm Brooklyn Property Managers Corp. ("BPM").
2. I have read the Debtor's application to employ BPM and believe the contents therein to be true.
3. My firm has proposed to the Debtor a property management agreement (the "Agreement") for BPM to be retained as the property manager of the commercial rental property located 797-815 Stanley Avenue, Brooklyn, NY (the "Property"). See annexed **Exhibit A – Property Management Agreement**.
4. This declaration is submitted in support of the Debtor's application approving the retention of BPM to act as property manager for the Property.
5. The services rendered by BPM would consist of those ordinarily associated with the management of commercial properties in Brooklyn, New York. This includes, but is not limited to, building maintenance; repairs; accounting and financial reporting; rent collection; bill payment; vendor management; building registration, documentation and violations; and lease preparation and renewals.

6. I reviewed the list of the potential parties in interest attached here to as “**Exhibit B**” and compared it to BPM’s customer records. To the best of my knowledge, neither I nor BPM hold any adverse interests to the Debtor, its creditors or any other parties in interest, and neither I nor BPM have any connection, present or prior, to the Debtor other than the proposed Agreement indicated above and annexed hereto. I therefore believe that BPM and I are disinterested parties as defined in section 101(14) of the U.S. Bankruptcy Code (11 U.S.C. §§ 101 *et seq.*)<sup>1</sup>.

7. I believe BPM’s retention is in the best interest of the Debtor because of BPM’s experience acting as a property manager for commercial rental buildings in this geographical area. I have 37 years of experience managing properties and BPM itself has been operating as a property manager for properties in Brooklyn and surrounding areas for eight years. Accordingly, I believe that both BPM and I are well-qualified to act as property managers for the Property.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury the foregoing is true and correct to the best of my knowledge and belief.

Dated: 9/30/24

  
Glenn Sorensen

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<sup>1</sup> The term “disinterested person” means a person that— (A) is not a creditor, an equity security holder, or an insider; (B) is not and was not, within 2 years before the date of the filing of the petition, a director, officer, or employee of the debtor; and (C) does not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the debtor, or for any other reason. 11 USC § 101 (14).